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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SOSTENES QUINTERO LOPEZ,,  
  
Defendant.

CASE NO. 1:22-CR-00267-JLT-SKO  
  
STIPULATION AND ORDER TO VACATE  
STATUS CONFERENCE AND SET CHANGE OF  
PLEA HEARING

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on May 15, 2024.
2. By this stipulation, defendant now moves to vacate the status conference on May 15, 2024, and set a change of plea hearing on May 28, 2024, at 9:00 a.m., and to exclude time between May 15, 2024, and May 28, 2024, at 9:00 a.m., under 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes wiretap recordings, thousands of pages of investigative reports, video, audio recordings, cell phone extractions, and other voluminous materials. On or about January 13, 2023, the government produced approximately 430 GBs of supplemental discovery. The government has extended a formal plea offer.

b) Counsel for defendant desires additional time to consult with his client, review the voluminous discovery, conduct independent investigation, finalize the plea agreement, and prepare for the change of plea hearing.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 15, 2024 to May 28, 2024, at 9:00 a.m., inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T4] because it is so unusual or so complex, due to the number of defendants, the nature of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by this section.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence May 15, 2024.

IT IS SO STIPULATED.

Dated: April 29, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ ANTONIO J. PATACA  
ANTONIO J. PATACA  
Assistant United States Attorney

1 Dated: April 29, 2024

/s/ HRISTO BIJEV

HRISTO BIJEV

Counsel for Defendant

SOSTENES QUINTERO

LOPEZ,

7 **ORDER**

8 IT IS SO ORDERED.

9  
10 DATED: 4/30/2024

*Sheila K. Oberto*

11 THE HONORABLE SHEILA K. OBERTO  
12 UNITED STATES MAGISTRATE JUDGE  
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